



February 13, 2004

VIA ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte**
WC Docket No. 01-338

Dear Ms. Dortch:

On February 12th and 13th, 2004, Michael DiMauro (President, Omega Communications Services, Inc.), Wes Robsenbalm (President & CEO, Bristol Virginia Utilities), and David Rubashkin (DBR Consulting), all representing the Fiber-to-the-Home Council, met with the following FCC personnel:

Commissioner Kevin Martin
Jason Williams, Senior Legal Advisor to Commissioner Kevin Martin
Christopher Libertelli, Senior Legal Advisor to Chairman Michael Powell
Matthew Brill, Senior Legal Advisor to Commissioner Kathleen Abernathy
Jessica Rosenworcel, Competition and Universal Service Advisor to
Commissioner Michael Copps
Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein
Pamela Arluk, Michelle Carey, Gail Cohen, Marcus Maher, Tom Navin, and
Brent Olson of the Wireline Competition Bureau.

The purpose of these meetings was: (1) to correct the record on the ex parte filed in the name of the FTTH Council on December 16, 2003 to indicate that said filing did not represent the position of the FTTH Council and was not reviewed or approved according to its policies and procedures; (2) to reinforce the strong technical and market rationale for the fiber-to-the-home rules in the Commission's Triennial Review Order; and (3) to provide a technical review of the advantages of fiber-to-the-home networks over alternative fiber loop technologies. The attached presentation, which elaborates on these three points, was distributed at each meeting.



Yours truly,

A handwritten signature in black ink that reads 'Dan Tatarka / EMS'. The signature is written in a cursive, flowing style.

Dan Tatarka
Executive Director
Fiber-to-the-Home Council

cc: Commissioner Kevin Martin
Jason Williams
Christopher Libertelli
Matthew Brill
Jessica Rosenworcel
Scott Bergmann
Pamela Arluk
Michelle Carey
Gail Cohen
Marcus Maher
Tom Navin
Brent Olson

PRESENTATION TO THE FEDERAL COMMUNICATIONS COMMISSION ON FTTH AND ALTERNATIVE FIBER LOOP TECHNOLOGIES

February 12/13, 2004

Fiber-to-the-Home Council



www.ftthcouncil.org

The FTTH Council

MISSION

The Fiber-to-the-Home Council is a non-profit organization comprising of telecommunications, computing, networking, applications, content and service provider companies. Its mission is to educate, promote, and accelerate FTTH and the resulting quality-of-life enhancements in the United States.

The FTTH Council

Objectives of FCC Meetings:

- Correct the FCC's record on the FTTH Council ex parte filing of December 16th
- Reiterate its support for the FTTH Rules in the Triennial Review Order (TRO)
- Reinforce the strong technical and market rationale for the TRO decision on FTTH
- Provide a technical review of the advantages of FTTH over alternative fiber loop technologies.

In reference to the December 16th Ex Parte Filing

The ex parte filing made in the name of the FTTH Council to the Wireline Competition Bureau on December 16th, 2003 is not the position of the FTTH Council and is not supported by the FTTH Council.

The December 16th filing, including the proposed rules and the presentation, was not reviewed or approved according to the FTTH Council policies and procedures.

Triennial Review Order & FTTH

The FTTH Council applauds the FCC's bold initiative in the TRO to bring the highest level of broadband connectivity to all Americans. Its FTTH Rules are:

- Based on a Sound Technological Foundation
- Focused on the Future
- Oriented to Encourage Investment
- Certain to move the U.S. to a leadership position in communications services

FTTH: The Ultimate Technology

- Based on a Sound Technological Foundation
 - Currently commercially available with capacities greater than 10 times other solutions on the market
 - Flexibility to handle services beyond “Triple Play”
 - Fiber to the Home can be used in many topologies and architectures

FTTH: The Ultimate Technology

□ Focused on the Future

- FTTH network capabilities can be easily upgraded and expanded (requiring only changes in optoelectronics) to handle future services requiring symmetric capabilities at Gbps speeds.
- FTTH loops are more durable and reliable.
- FTTH is clearly the optimum option as a long-term solution.

FTTH: The Ultimate Technology

- Encourages Investment in Networks and Content
 - By sending clear, strong and soundly based signals to the market, the FCC's FTTH decision is expediting deployment.
 - As more providers implement FTTH solutions (based on stable rules), greater economies of scale will be realized, decreasing the costs of deployment and setting in motion a "virtuous cycle".
 - Large and more ubiquitous "pipes" encourage accelerated development of innovative content.

FTTH: The Ultimate Technology

- Required to keep the US leadership position in the Global economy
 - The US has fallen to 11th Worldwide in broadband capability
 - New content uses and demands will create new market opportunities
 - Capability of handling future services will ensure the US is at the forefront of communications once the technology is deployed in significant volume.

The FCC got it Right!

By recognizing these factors regarding FTTH in the TRO, the FCC has broken the broadband deadlock. Its forward looking decision has already spurred interest, investment and renewed innovation in broadband networks.

This is witnessed by...

The FCC got it Right!

- ☐ RBOCs have issued a Request for Quote (RFQ) for Passive Optical Networking solutions.
- ☐ Verizon and SBC have publicly named vendors for access fiber equipment.
- ☐ Verizon has publicly identified vendors for access fiber.
- ☐ Verizon has announced plans to deploy FTTH to about 1M premises in 2004; SBC has announced plans to deploy to 300k/yr premises beginning in 2005.
- ☐ New vendors have recently entered the FTTH space.

A Review of the Advantages of FTTH over Alternative Fiber Loop Technologies

- Bandwidth & Service Distinction
- Standards References
- Symmetrical Services

Bandwidth & Service Distinction

- FTTH provides greater bandwidth capacity and transmission speeds.
 - Commercially available “off-the-shelf” FTTH equipment delivers transmission speeds up to 1 Gbps and NextGen systems will deliver even higher data rates.
 - APON – 622/155* Mbps (1:32 shared)
 - BPON – 622/622* Mbps (1:32 shared)
 - GPON – 2.5/2.5* Gbps (1:64 shared) (Future Product)
 - EPON – 1/1* Gbps (1:16 shared under one draft standard)
 - P2P – 1/1 Gbps (non-shared)
 - Hybrid – varies by vendor

* These upstream data rates are shared

Standards References

- FTTH employs clearly defined and widely used standards including:
 - Full Service Access Network (FSAN)
 - ITU-T G.983, G.984
 - Ethernet in the First Mile (EFM)
 - IEEE 802.3ah (standardization expected in 2004)

There are also a number of proprietary fiber based solutions available.

Symmetrical Services

- FTTH is delivering high transmission speeds on a symmetrical basis today and will greatly expand this capability tomorrow. This permits FTTH users to take advantage of applications that require such two-way, “fat pipe” capabilities, including:
 - hosting web servers out of their homes/business
 - playing next-generation interactive games
 - holding video phone calls
 - using telemedicine
 - hosting personal television stations

Conclusion

- FTTH is the ultimate broadband technology. It is clearly superior to alternative fiber loop technologies for delivering high bandwidth, symmetrical services to the home, both now and in the future.
- The FTTH Council applauds the FCC for “Getting it Right” in its TRO decision which crafted rules based on real and meaningful technological distinctions.

This presentation is presented in behalf of all the member companies of the FTTH Council

3M
ADC
Adesta LLC
AFL Telecommunications
Alcatel
Allied Telesyn
Alloptic
Alpha Technologies
Americable
American Power Conversion
Atlantic Engineering Group
Bechtel Communications
Bristol Virginia Utilities
Carrier Access Corporation
C-Cor
Centillum Communications
Charles Machine Works
Chelan County PUD
Cisco Systems
CommScope
Corning Incorporated
Dalton Utilities
DynamicCity Metronet Advisors
Eagle Broadband
ECI Telecom
Ericsson
ETI Software Solutions

FiberCore Networks
Fluor
FONS Corporation
FTTH Communications LLC
FTTX Systems
Furukawa America (sub of OFS)
Gainesville Regional Utilities
General Bandwidth
Gould Fiber Optics
Grant County PUD
Green, Paul
Harmonic
Hitachi Telecom
IMC Networks
LG cable Ltd.
Light Brigade, The
Long Lines, Ltd.
Lucent Technologies
Motorola BCS
Neptec Optical Solutions
New England Broadband, LLC
Nexans*
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Paceon
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Sumitomo Electric Lightwave
Tandberg Television Inc.
Team Fishel
Teem Photonics
Telco Systems
Telework Consortium
Tetra Tech Communications
Tyco Electronics
UTOPIA
Verizon
Vinci Systems
Volex Inc.
Wave7Optics
Worldwide Packets
Zero dB

Thank You

